

# **EXHIBIT 16**

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January 5, 2024

**BY CERTIFIED MAIL – R.R.R.**

Fahrenheit Mechanical LLC  
5718 2<sup>nd</sup> Avenue  
Brooklyn, NY 11220

Fahrenheit Mechanical LLC  
120 Broadway, 36<sup>th</sup> Floor  
New York, NY 10271

Re: *The Ideal Supply Company v. Fahrenheit Mechanical Inc., et al.*  
Index No.: 152298/2021

Dear Mr. Rusi:

My firm represents Plaintiff The Ideal Supply Company (“Ideal Supply”) in the above-referenced matter. On December 14, 2023, we served on Fahrenheit Mechanical LLC (“Fahrenheit”) five demands pursuant to section 76 of the N.Y. Lien Law (the “Section 76 Demands”) requiring Fahrenheit to provide the following information for *each* of the projects identified in the Section 76 Demands:

1. the date when and place where each payment was made;
2. with respect to each payment a statement of the nature of the trust claim or if the owner is trustee the nature of the expenditure other than payment of a trust claim, for which the payment is made, sufficient in any case to identify the payment as a payment for a trust purpose and to show whether it is for labor, materials, taxes, insurance, performance under contract or subcontract, interest charges on mortgages, or other particular trust claim or item of cost of improvement;
3. if any such payment was made pursuant to contract between the trustee and the recipient of the payment, the date when such contract was made, whether it was oral or in writing, and the agreed price named therein; and
4. if any such payment upon a contract or subcontract relates to a particular item or items of the improvement, or if any such payment for materials or services relates to materials furnished, or services, other than daily or weekly labor, rendered for or upon a particular item or items of the improvement, a description of such item or items.


Further, section 76 of the Lien Law requires that the information be provided within ten (10) days of service. Given that Ideal Supply served the Section 76 Demands on Fahrenheit on December 14, 2023, Fahrenheit was required to provide the requested information no later than December 24, 2023. To date, we have received no response from Fahrenheit and no request for an extension.

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We hereby demand that Fahrenheit comply with the Lien Law within fourteen (14) days of the date of this letter. This letter constitutes Ideal Supply's good faith endeavor to obtain the information sought. Please be guided accordingly.

KAUFMAN DOLOWICH LLP

By: 

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